

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<i>In the matter of</i>	)	
	)	
To Coordinate the Power Radio Service,	)	
Railroad Radio Service,	)	RM-10687
And Automobile Emergency Radio Service	)	
Under Part 90 of the Commission's Rules	)	
Commission's Rules to	)	
ITA Informal Request for Certification	)	

**COMMENTS OF  
Booth & Associates, Inc.**

April 2, 2003

**I. INTRODUCTION**

Booth & Associates, Inc. is an employee-owned engineering/consulting firm located in Raleigh, North Carolina. Since 1960, the Company has provided a plethora of critical services to the public electric utility sector in thirty-eight states across the country. Clients include electric power cooperatives, municipal power agencies, investor owned utilities, and national organizations representing these entities, including the National Rural Electric Cooperative Association and the American Public Power Association. One of our six operating divisions is the Telecommunications Division, which assists clients with land mobile voice/data, SCADA, microwave, and fiber optic system design and implementation. This division also assists clients with license acquisitions and renewals, as well as other regulatory services.

## **II. WE STRONGLY VOICE OUR SUPPORT OF ITA'S POSITION CONCERNING COMPETITIVE COORDINATION SERVICES.**

Several utility clients have chosen to work with ITA for various voice and data licensing needs. All applications have been coordinated accurately, timely, and competitively. However, ITA knows that if their services did not meet the expectations of their customers and our utility clients, they would have the choice of working with another competitive coordination group. Yet these same clients, when faced with dedicated-use needs, must still coordinate through the industry-specific coordinator in the bands below 470 MHz and are bound to do business with a single entity.

Competition is key in this industry. As an example, the United Telecom Council (UTC) coordination costs for a single site MAS 900 MHz application are \$375. ITA's charge for the same work is \$250.

## **III. THERE ARE NO VALID TECHNICAL ISSUES THAT SHOULD PREVENT ITA FROM CONDUCTING COMPETITIVE COORDINATION SERVICES FOR THE FORMER POWER, RAILROAD, AND AUTOMOBILE EMERGENCY POOLS.**

ITA is very qualified to perform these services, and in addition, can demonstrate how the Commission's approval of their request would not detrimentally affect licensee applicants in these license pools in any significant way.

- All Part 90 coordinators were certified to perform 800 MHz coordination based on (a) representativeness of the users of the frequencies to be coordinated, (b) the

- entity's overall coordination plan (including how recommendations would be made and equality of applicant treatment), (c) the entity's experience coordinating frequencies in the service or technical expertise, and (d) its nationwide coordination capability. ITA meets, and goes well beyond, these criteria as one of only three coordinators executing a *Memorandum of Understanding* with the Commission to act as the first line of interference resolution for the Commission, while providing an excellent speed-of-service and customer service;
- ITA's membership includes power utilities, railroads and automobile emergency entities and organizations;
  - ITA also has clients for which it performs power, railroad and automobile emergency coordination;
  - For over 15 years, ITA was the sole coordinator of 800 MHz Industrial/Land Transportation channels, which was the primary 800 MHz pool of frequencies for these licensees.
  - ITA does not seek to change or expand eligibility for these channels; they simply seek competitive coordination;
  - The ULS database has made the sharing of information among frequency coordinators effortless;
  - The coordination system and information sharing process is already in place;
  - Because power, railroad, and automobile emergency coordinators will be receiving notification of certifications on these channels, these coordinators will have the opportunity to review, and comment if necessary, to a specific coordination they feel threatens incumbent licensees;

- For over 20 years, ITA has experience coordinating wide-area, multi-state and exclusive-use systems for utility, railroad and automotive emergency eligibles;
- Competition will spark faster speed-of-service for these eligibles; lower cost due to the lack of need for concurrence; improved customer service; enhanced sharing among frequency coordinators; and greater efficiencies in the coordination process through innovative new ideas to meet consumer demand.

### **III. CONCLUSION**

We urge the Commission to approve ITA's request for permission to competitively coordinate in the power, railroad, and automobile emergency pools, as this decision would be in the best interests of our clients and the general public.

Respectfully submitted,

BOOTH & ASSOCIATES, INC.

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